

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

TAREK AL-BIREKDAR,)	
)	
Plaintiff,)	
)	
vs.)	
)	Cause No.: 4:06CV1726 DJS
CHRYSLER GROUP, LLC, f/k/a)	
DAIMLERCHRYSLER CORPORATION,)	
)	
Defendant.)	

**PLAINTIFF TAREK AL-BIREKDAR'S MOTION FOR
ADDITIONAL TIME TO FILE PETITION FOR ATTORNEY'S FEES**

COMES NOW Plaintiff Tarek Al-Birekdar, by and through counsel, and hereby moves this Court for additional time, up to and including April 26, 2013, in which to respond to file his Petition for Attorney's Fees based upon the following:

1. On March 3, 2013, the Eighth Circuit Court of Appeals entered an Order in the appeal of the above-styled case, Appeal No. 09-1091, remanding to the District Court the issue of an award of attorney's fees to Tarek Al-Birekdar for time spent on the post-trial motions which were not included in his original fee request.
2. Plaintiff and Defendant are in settlement discussions in an effort to avoid the time and expense of moving the court, responding, objecting, and replying regarding attorney's fees and post-judgment interest.
3. Defendant consents to this request for additional time.

WHEREFORE, Plaintiff respectfully requests up to and including April 26, 2013, in which to file a Petition for Attorney's Fees, together with any and all further relief as this Court deems just and proper under the circumstances.

Respectfully submitted,

**LAW OFFICE OF
KRISTIN F. WHITTLE, L.L.C.**

/s/ Kristin Whittle Parke
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TAREK AL-BIREKDAR

Certificate of Service

This is to certify that a true and correct copy of the foregoing was sent electronically via this Court's ECF System this 26th day of March, 2013, to: Mr. Mark C. Tatum, mtatum@shb.com, Mr. Brian P. Baggott, bbaggott@shb.com, Mr. Kevin Mark Smith, ksmith@shb.com, Attorneys at Law, SHOOK, HARDY & BACON L.L.P., 2555 Grand Blvd., Kansas City, Missouri 64108-2613, Attorneys for Defendant DaimlerChrysler Corporation.

/s/ Kristin Whittle Parke